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LETTER FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING
COMMENTS ON DRAFT FINAL REMEDIAL DESIGN DOCUMENT LANDFILL 5 FORT
SHERIDAN IL
6/25/2004
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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June 25, 2004

Headquarters, Forces Command
Deputy Chief of Staff, G1
Attn: AFG1-BC (Victor Bonilla)
1777 Hardee Avenue, SW
Fort McPherson, Georgia 30330-1062

Re: Draft Final Remedial Design Document
Landfill 5, Fort Sheridan Environmental
Restoration Project, Fort Sheridan, Illinois
Dated June 10, 2004

0970555001/Lake
Fort Sheridan (BRAC)
Superfund/Technical

Dear Mr. Bonilla:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Draft Final Remedial Design Document Landfill 5, Fort Sheridan Environmental Restoration Project, Fort Sheridan, Illinois. It was dated June 10, 2004 and received on June 15, 2004. Illinois EPA has reviewed the document and has the following comments.

- 1) **List of Acronyms** – The definition of BCT should be BRAC Cleanup Team. Please revise.
- 2) **Section 2.1, Response to Illinois EPA Comment (RtC) Number 4** – Comment is not fully addressed. The potential risks for all future scenarios should be presented, rather than just the value for residents exposed to surface soil. By only providing one risk value, this revision appears to downplay the other potential risks. Please list all of the calculated risk values that are within or above the risk management range.
- 3) **Section 2.1.4, RtC Number 8** – The Agency does not agree with the provided revision. It is too vague. Suggest rewording the last sentence of the first paragraph as follows:
The RAO for Landfill 5 is a human health risk value of 1×10^{-6} , but the final residual risk level may be within the risk management range of 1×10^{-4} to 1×10^{-6} or less than 10^{-6} .
- 4) **Section 2.2.8, RtC Number 9** – The revised version does not match the previously agreed to wording. Mr. Larry Emerson (Kemron) and I worked out the language for this section via e-mail between May 20 and May 24 of this year. Various wording from every paragraph of our agreed upon language has been omitted or changed. Please review the agreed upon proposed changes to the text and revise to match. Specifically, the last two sentences of the first paragraph, the last two sentences of the second paragraph, the last sentence of the third paragraph, and the last

paragraph, as per the e-mail dated May 24 from Mr. Emerson to me.

- 5) **Section 2.3.4.1, RtC Number 18** – The last sentence of the first paragraph includes the words “by weight”. This was not agreed to and is unacceptable. How can one make a visual determination by weight? The Agency suggests using “by volume”, in place of “by weight.”
- 6) **Table 2-2** – The groundwater monitoring should, for this estimate, continue at least annually for the entire duration of the operation and maintenance (30 years) just as the inspections and repair work do. The groundwater monitoring may well not be terminated at the end of the initial five years of data collection. This will change the total and present worth costs for the remedy.
- 7) **Table 2-2** – The bottom half of the table, which included the present worth costs of the bituminous pavement replacement at 10, 20, and 30 years, has been removed and replaced with the groundwater sampling information. These costs, or something akin to them, need to be added back. The operation and maintenance for Landfill 5 will need to maintain, and replace when necessary, all pavement remaining at the surface above the landfill, in perpetuity. This would include, but not be limited to, the parking area at Building 599 and First Street, unless other arrangements have been made.
- 8) **Appendix C, RtC Number 42** – The response states the correction has been made. It has not. Please revise according to the original comment.
- 9) **Appendix C, RtC Number 44** – See comment number 4 above. The language in this section (4.0) of this appendix should match that in Section 2.2.8 of the text, once it has been revised.
- 10) **Appendix C, Section 5.3** – The first sentence states that the quarterly reports will be submitted to the Army. Illinois EPA will also require a copy of these reports. Please include Illinois EPA on the list to receive copies.
- 11) **Appendix D, Page 1, Agency Coordination** – There is a significant amount of text from the LUCMOA that should have been included in Appendix D that has not been. The first paragraph should have the following text added to it to be consistent with the LUCMOA language:

Such notification must be provided for the purpose of obtaining Illinois EPA concurrence with the HQDA BRAC AFO determination as to whether the contemplated change will or will not necessitate the need for re-evaluation of the selected remedy or implementation of specific measures to ensure continued protection of human health and the environment.

Except in the case of an emergency where the Navy, Reserve, and the HQDA BRAC AFO personnel reasonably believe it is not practicable to wait for Illinois EPA concurrence, no Land Use Change should be implemented until Illinois EPA concurrence is obtained, consistent with the timeliness requirements set below. Each notification or request for concurrence must include:

1. *An evaluation of whether the anticipated Land Use Change will pose*

unacceptable risks to human health and the environment or negatively impact the effectiveness of the selected Site remedy;

2. *An evaluation of the need for any additional remedial action or LUCs resulting from implementation of the anticipated Land Use Change; and,*
3. *A proposal for any necessary changes in the selected Site remedy.*

After the HQDA BRAC AFO receives notice from either the Navy or Reserve of an anticipated Land Use Change at a Site, the HQDA BRAC AFO will notify the Illinois EPA. As provided above, the Illinois EPA shall evaluate the information and will provide a response within 30 working days to the affected party and the HQDA BRAC AFO. If a response is not provided within 30 working days, the Illinois EPA can request an extension. If a response is not provided within the requested and approved extension it is presumed that the Illinois EPA concurs with the proposed change.

Any of the following will constitute a Land Use Change:

1. *Any change in land use (e.g. from industrial to residential) inconsistent with any land use contained in those specific exposure assumptions in the human health or ecological risk assessments that served as the basis for the LUCs implemented at the Site;*
2. *Any Site activity disrupting the effectiveness of the implemented LUC. Examples include, but are not limited to: excavation at a landfill; groundwater pumping impacting a groundwater pump and treat system; a construction project impacting ecological habitat protected by the remedy; removal of a fence; unlocking of a gate; or removal of warning signs; or,*
3. *Any Site activity intended to alter or negate the need for the specific LUC(s) implemented at the Site.*

12) **Appendix D, Description of Land Use Controls** – The first sentence should conclude with, *as well as in the associated LUCIP.*

13) **Appendix D, Site Access** – The last sentence should read, *“...at all reasonable times for purposes including, but not limited to, review compliance efforts...”*

14) **Appendix D** – Following the last paragraph, there should be another paragraph to read as follows:

An annual report will be submitted to Illinois EPA signed by the Navy, Army Reserve, and the HQDA BRAC AFO certifying the continued retention of all implemented LUCs.

- 15) **Appendix D** – The Land Use Control Implementation Plan (LUCIP) for Landfill 5, from the LUCMOA, must be included herein. It should be updated as necessary to include a description of the site after physical remedy implementation and include a map of the site.
- 16) **Drawing #19, RtC Number 47** – The response indicates that the drawing has been revised. It does not appear that it has. Is the detail for the "Typical Asphalt Pavement Detail" provided to show the profile of a typical asphalt installation (for those areas that the pavement will not be replaced) or is it provided to show the detail for areas on Landfill 5 that will have the pavement replaced? If the former, then the detail is acceptable. If the latter, then the detail still requires revision to show the two feet of compacted clay and the GCL. Please verify which is the case and amend as necessary. It would also be helpful to spell out on the drawing to which case it is applicable.

If you have any questions regarding this correspondence, you may contact me at 217/557-8155 or via e-mail at Brian.Conrath@epa.state.il.us.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Owen Thompson, USEPA (SR-6J)
Mark Shultz, US Navy - EFA Midwest
Kurt Thomsen, Fort Sheridan EC

Chris Boes, USAEC
Kurt Zacharias, US Army Reserve
Mary Lou Rochotte, KEMRON